

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 07 CR 781
v.	)	
	)	Judge Zagel
JAMES FARIS and	)	
JOSEPH MOGAVERO	)	

**GOVERNMENT'S MOTION TO REVOKE BOND**

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, hereby moves this Court to immediately revoke the bond of defendant James Faris ("Faris"), issue a warrant for the arrest of Faris, and to detain Faris pending trial, on the basis of the violations set forth in the Report of Pretrial Services dated July 17, 2008, and further states as follows:

1. Upon his arrest for bank robbery, Faris was not detained, but instead was sent to a drug rehabilitation program, and upon completion, was sent home. By March 4, 2008, Faris had tested positive for drugs and also had stopped reporting to Pretrial Services. At that time, this Court revoked bond. Shortly thereafter, this Court allowed defendant to be released on electronic home monitoring. Faris has been granted day trips to Pontiac, Illinois, to visit his son, who is seriously ill.

2. On July 16, 2008, Victor Alvarez ("Alvarez") of Pretrial Services granted permission to Faris to visit his son for the day of July 16, 2008, and to return to his home on electronic monitoring by 8:00 p.m. on July 16, 2008. Faris did not return home by 8:00 p.m., still has not returned home, and has not been seen or heard from since obtaining permission to visit his son more than 24 hours ago.

3. On July 16, 2008, when Faris did not return home at 8:00 p.m., Mr. Alvarez began calling the home where Faris lived, but received no answer. Finally, the next morning, Faris's mother answered the telephone and denied any knowledge of Faris's whereabouts.

4. Mr. Alvarez also left a message for Faris's custodian, his sister, Mary Kay Glogovac, who represented to this Court that she would act as custodian, be aware of Faris's whereabouts, and contact the Court if she could not reach Faris. Instead, his custodian told Mr. Alvarez that she had no idea that Faris had been out yesterday or that he had not returned home as required, and that she had no idea where he was. Glogovac did not offer to make any effort to contact Faris, nor did she express any concern over her obligations as custodian.

5. This is the second time that Faris has committed a serious violation of his bond restrictions. That, coupled with the overwhelming evidence that Faris committed at least one bank robbery, is grounds to revoke Faris's bond immediately, issue a warrant for his arrest, and detain Faris pending trial.

WHEREFORE, the government respectfully requests that this Court revoke Faris's bond immediately, issue a warrant for his arrest, and detain Faris pending trial.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney

By: s/Sheri H. Mecklenburg\_\_\_\_\_  
SHERI H. MECKLENBURG  
Assistant U.S. Attorney  
219 South Dearborn  
Chicago, Illinois 60604  
(312) 469-6030

**CERTIFICATE OF SERVICE**

The undersigned Assistant United States Attorney hereby certifies that the foregoing GOVERNMENT'S MOTION TO REVOKE BAIL was filed with the Federal District Court for the Northern District of Illinois, by the ECF system, on July 17, 2008.

By: s/ Sheri H. Mecklenburg  
Sheri H. Mecklenburg  
Assistant United States Attorney